

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

ANTHONY DONTE COLLIER,
a/k/a KOLEONE THE GREAT; and
ANTIONE DOMINIQUE COLLIER

INDICTMENT

Case No. _____

Violation: 18 U.S.C. §§ 371, 1591(a)(1),
1591(b)(1), 1591(b)(2), 1594(a), and
1594(d)

COUNT ONE

Conspiracy

The Grand Jury Charges:

From in or about April 2015 and continuing through the date of this Indictment, in the
Districts of North Dakota, Minnesota, and elsewhere,

ANTHONY DONTE COLLIER, a/k/a KOLEONE THE GREAT,
and ANTIONE DOMINIQUE COLLIER

knowingly and willfully combined, conspired, confederated, and agreed with each other and
others, both known and unknown to the grand jury, to commit offenses against the United
States, including:

- a) Knowingly transporting individuals in interstate commerce with the intent that
such individuals engage in prostitution, in violation of Title 18, United States
Code, Sections 2421 and 2; and
- b) Traveling in interstate commerce and using a facility in interstate and foreign
commerce, namely, the internet and telephone capabilities, with the intent to
promote, carry on, and facilitate the promotion, management, establishment,
and carrying on of an unlawful activity; specifically, a business enterprise

involving prostitution, in violation North Dakota Century Code, Sections 12.1-29-01, 12.1-29-02, and 12.1-29-03, and thereafter performing and attempting to perform an act to promote, manage, establish, and carry on and to facilitate the promotion, management, establishment, and carrying on of such unlawful activity, in violation of Title 18, United States Code, Sections 1952(a)(3) and 2.

Manner and Means of the Conspiracy

1. It was part of the conspiracy that ANTHONY DONTE COLLIER, a/k/a KOLEONE THE GREAT, and ANTIONE DOMINIQUE COLLIER instructed individuals to engage in prostitution activities for the purpose of receiving United States currency;
2. It was further part of the conspiracy that ANTHONY DONTE COLLIER, a/k/a KOLEONE THE GREAT, recruited vulnerable women and juvenile girls to engage in prostitution activities;
3. It was further part of the conspiracy that ANTHONY DONTE COLLIER, a/k/a KOLEONE THE GREAT, physically assaulted the women and threatened to physically assault the women for the purpose of forcing them to engage in prostitution activities; and
4. It was further part of the conspiracy that ANTHONY DONTE COLLIER, a/k/a KOLEONE THE GREAT, and ANTIONE DOMINIQUE COLLIER used cellular telephones, vehicles, hotels, and private residences for the purpose of facilitating the prostitution activities.

Overt Acts

In furtherance of the conspiracy and to effect its objects, the following overt acts, among others, were committed in the District of North Dakota, Minnesota, and elsewhere:

1. On or about October 14, 2015, ANTHONY DONTÉ COLLIER, a/k/a KOLEONE THE GREAT, registered a business identified as BGI Promotions, LLC, with the North Dakota Secretary of State for the purpose of recruiting women and girls into prostitution;
2. In or about April 2015 and continuing until November 2015, ANTHONY DONTÉ COLLIER, a/k/a KOLEONE THE GREAT, and others, both known and unknown to the grand jury, transported and arranged for the transportation of Victim 1, Victim 2, and Victim 3 from and between Minnesota and North Dakota, with the intent that such individuals engage in prostitution;
3. In or about October 2015 and continuing through the date of this Indictment, ANTHONY DONTÉ COLLIER, a/k/a KOLEONE THE GREAT; ANTIONE DOMINIQUE COLLIER; and others, both known and unknown to the grand jury, transported and arranged for the transportation of Victim 5 from and between Minnesota and North Dakota with the intent that such individual engage in prostitution;
4. In or about April 2015 and continuing until November 2015, ANTHONY DONTÉ COLLIER, a/k/a KOLEONE THE GREAT, instructed Victim 1, Victim 2, Victim 3, Juvenile Victim 4, and Victim 5 on pricing for different sexual activities;
5. In or about April 2015 and continuing until November 2015, ANTHONY DONTÉ COLLIER, a/k/a KOLEONE THE GREAT, individually and by aiding and

- abetting, took photographs of Victim 1, Victim 2, Victim 3, Juvenile Victim 4, and Victim 5 in sexually suggestive poses for the purpose of posting the photographs to the escort section of backpage.com, an online advertising website;
6. In or about April 2015 and continuing until November 2015, ANTHONY DONTÉ COLLIER, a/k/a KOLEONE THE GREAT, and others, both known and unknown to the grand jury, rented hotel rooms for Victim 1, Victim 2, Victim 3, Juvenile Victim 4, and Victim 5 for the purpose of engaging in prostitution activities;
 7. In or about April 2015 and continuing until November 2015, ANTHONY DONTÉ COLLIER, a/k/a KOLEONE THE GREAT, instructed Victim 1, Victim 2, Victim 3, Juvenile Victim 4, and Victim 5 to provide the proceeds that they received from their prostitution activities to ANTHONY DONTÉ COLLIER; and
 8. In or about November 2015 and continuing through the date of this Indictment, ANTONIO DOMINIQUE COLLIER instructed Victim 5 to provide ANTONIO DOMINIQUE COLLIER with the proceeds of Victim 5's prostitution activities;
- In violation of Title 18, United States Code, Section 371.

COUNT TWO

Sex Trafficking by Force, Fraud, or Coercion

The Grand Jury Further Charges:

From in or about April 2015 and continuing until in or about October 2015, in the District of North Dakota, and elsewhere,

ANTHONY DONTE COLLIER,
a/k/a KOLEONE THE GREAT,

knowingly, in and affecting interstate commerce, recruited, enticed, harbored, transported, provided, obtained, advertised, and maintained by any means, a person, namely, Victim 1, knowing that force, fraud, and coercion would be used to cause the person to engage in a commercial sex act, as defined in Title 18, United States Code, Section 1591(e)(3);

In violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(1), and 1594(a).

COUNT THREE

Sex Trafficking by Force, Fraud, or Coercion

The Grand Jury Further Charges:

From in or about April 2015 and continuing until in or about October 2015, in the Districts of North Dakota, and elsewhere,

ANTHONY DONTE COLLIER,
a/k/a KOLEONE THE GREAT,

knowingly, in and affecting interstate commerce, recruited, enticed, harbored, transported, provided, obtained, advertised, and maintained by any means, a person, namely, Victim 2, knowing that force, fraud, and coercion would be used to cause the person to engage in a commercial sex act, as defined in Title 18, United States Code, Section 1591(e)(3);

In violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(1), and 1594(a).

COUNT FOUR

Sex Trafficking by Force, Fraud, or Coercion

The Grand Jury Further Charges:

From in or about September 2015 and continuing until in or about October 2015, in the District of North Dakota, and elsewhere,

ANTHONY DONTE COLLIER,
a/k/a KOLEONE THE GREAT,

knowingly, in and affecting interstate commerce, recruited, enticed, harbored, transported, provided, obtained, advertised, and maintained by any means, a person, namely, Victim 3, knowing that force, fraud, and coercion would be used to cause the person to engage in a commercial sex act, as defined in Title 18, United States Code, Section 1591(e)(3);

In violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(1), and 1594(a).

COUNT FIVE

Attempted Sex Trafficking of Children

The Grand Jury Further Charges:

In or about October 2015, in the District of North Dakota, and elsewhere,

ANTHONY DONTE COLLIER,
a/k/a KOLEONE THE GREAT,

knowingly, in and affecting interstate commerce, recruited, enticed, harbored, transported, provided, obtained, advertised, and maintained by any means, a person, namely, Juvenile Victim 4, knowing that force, fraud, and coercion would be used to cause the person to engage in a commercial sex act and that the person had not attained the age of 18 years, and would be caused to engage in a commercial sex act, as defined in Title 18, United States Code, Section 1591(e)(3);

In violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(1), 1591(b)(2), and 1594(a).

COUNT SIX

Sex Trafficking by Force, Fraud, or Coercion

The Grand Jury Further Charges:

From in or about October 2015 and continuing through the date of this Indictment, in the Districts of North Dakota, Minnesota, and elsewhere,

ANTHONY DONTE COLLIER, a/k/a KOLEONE THE GREAT,
and ANTIONE DOMINIQUE COLLIER

knowingly, in and affecting interstate commerce, recruited, enticed, harbored, transported, provided, obtained, advertised, and maintained by any means, a person, namely, Victim 5, knowing that force, fraud, and coercion would be used to cause the person to engage in a commercial sex act, as defined in Title 18, United States Code, Section 1591(e)(3);

In violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(1), and 1594(a).

FORFEITURE ALLEGATION

The Grand Jury Further Finds Probable Cause That:

Upon conviction of violating Title 18, United States Code, Section 1591, as charged
in Counts 1-⁶~~5~~ of this Indictment,

ANTHONY DONTE COLLIER, a/k/a KOLEONE THE GREAT,
and ANTIONE DOMINIQUE COLLIER

shall forfeit to the United States, any property, real or personal, that was involved in, used,
and intended to be used to commit and to facilitate the commission of such violations and
property traceable to such property and any property, real or personal, constituting or derived
from, any proceeds obtained, directly and indirectly, as a result of such violations and any
property traceable to such property, including, but not limited to, the following:

- One LG cellular telephone, SN: 507CYWC322617;
- One Motorola cellular telephone, SN: P46AXY2MC6; and
- One Dell laptop computer, Inspiron Model 15R-5537, no SN.

By virtue of commission of the felony offenses as charged in this Indictment, all right,
title, and interest in the above-described property is vested in the United States and is hereby
forfeited to the United States, pursuant to Title 18, United States Code, Section 1594(d).

A TRUE BILL:

/s/ Foreperson
FOREPERSON

/s/ Christopher C. Myers
CHRISTOPHER C. MYERS
United States Attorney

JKP:tla